



**Mike**  
**CLARK**  
**US Congress**

2012 MAY -1 PM 2: 32

**MikeClarkCongress.com**

OFFICE OF GENERAL  
COUNSEL

**April 25, 2012**

**SENSITIVE**

**MUR #** 6566

The purpose of this letter is to report possible violations of Federal Election law under the Commission's jurisdiction. The undersigned is a candidate for the 5<sup>th</sup> Congressional District in the state of Connecticut. The complaint is against the Lisa Wilson-Foley For Congress campaign committee, Apple Health Care, Inc. and John Rowland. The complaint is based upon information from media sources and other information generally available to the public, including statements made by the Wilson-Foley campaign itself.

**Lisa Wilson-Foley is a candidate for the same 5<sup>th</sup> Congressional seat. Apple Health Care, Inc. is a Connecticut corporation whose President is Brian J. Foley, the husband of Lisa Wilson-Foley. John Rowland is a radio personality and a former Republican governor of the State of Connecticut.**

**The complaint is based on the following:**

1. In an article posted in the April 23rd online edition of the Register Citizen newspaper, it was reported that John Rowland has recently been involved in a private business relationship with Apple Health Care. This was described as "work" for Apple Health Care in a "consulting capacity." This was confirmed by a spokesman for the Wilson-Foley campaign, Chris Healy.

In an earlier article dated April 5<sup>th</sup>, 2012, when asked about the former governor's involvement in the campaign, Mr. Healy was quoted as saying that Mr. Rowland was "volunteering" his time for the Wilson-Foley campaign. This article further mentions that Mr. Rowland was involved in a fundraiser on Wilson-Foley's behalf.

2. In the same article, spokesman Healy confirmed that Rowland has been actively making calls to delegates of the upcoming 5th Congressional Convention, where the party will endorse a candidate for the November 6<sup>th</sup>, 2012 campaign.

**Paid for by Clark for Congress**

**P.O. Box 1314, Farmington, CT 06034**

3. In a Connecticut political blog entitled "Daily Ructions, it was reported on April 16, 2012 that John Rowland had made calls to a particular Republican delegate in support of Wilson-Foley. When this delegate later endorsed a different candidate, Mr. Rowland again called the delegate and questioned his endorsement.

4. Since resigning from the governor's office, Mr. Rowland has worked as the afternoon co-host of a politically-themed radio show broadcast on WTIC AM 1080, a prominent Connecticut radio station.


5. In an article posted in the April 25, 2012 online edition of the Register Citizen newspaper, it was reported that prior to the 2010 5<sup>th</sup> Congressional campaign, John Rowland had offered his campaign consulting services to another Republican congressional candidate, Mark Greenberg. The article mentioned that Mr. Rowland asked to be paid through Mr. Greenberg's non-profit animal shelter and not through the Greenberg campaign, a violation of Federal Election laws. The article further reports that Mr. Greenberg and his animal shelter did not hire Mr. Rowland.

6. In its FEC filings to date, the Wilson-Foley campaign has not listed John Rowland as a paid employee, consultant or vender to the campaign.

Based upon this information, two potential violations of Federal law may have occurred. First, there may have been violation by the Wilson-Foley campaign in failing to report as contributions to it the payments made by Apple Rehab to John Rowland for services that may have benefitted the campaign. Under 11 CFR 102.8-102.10, anything of value given to influence a campaign is considered a contribution.

Second, any payments by Apple Rehabilitation to John Rowland for campaign-related activities would be a clear violation of 11 CFR 114.2.

Respectfully submitted,



Mike Clark  
Mike Clark For Congress  
P.O. Box 1314  
Farmington CT 06034

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STATE OF CONNECTICUT )

) ss:

COUNTY OF HARTFORD)

Personally appeared Mike Clark, signer and sealer of the forgoing instrument and acknowledged the same to be his free act and deed, before me,



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William Mastrogiovanni, Jr.  
Commissioner of Superior Court

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Wednesday, April 25, 2012

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# Lisa Wilson-Foley criticized for John Rowland backing by Mike Clark, who put him behind bars

Posted on April 5, 2012



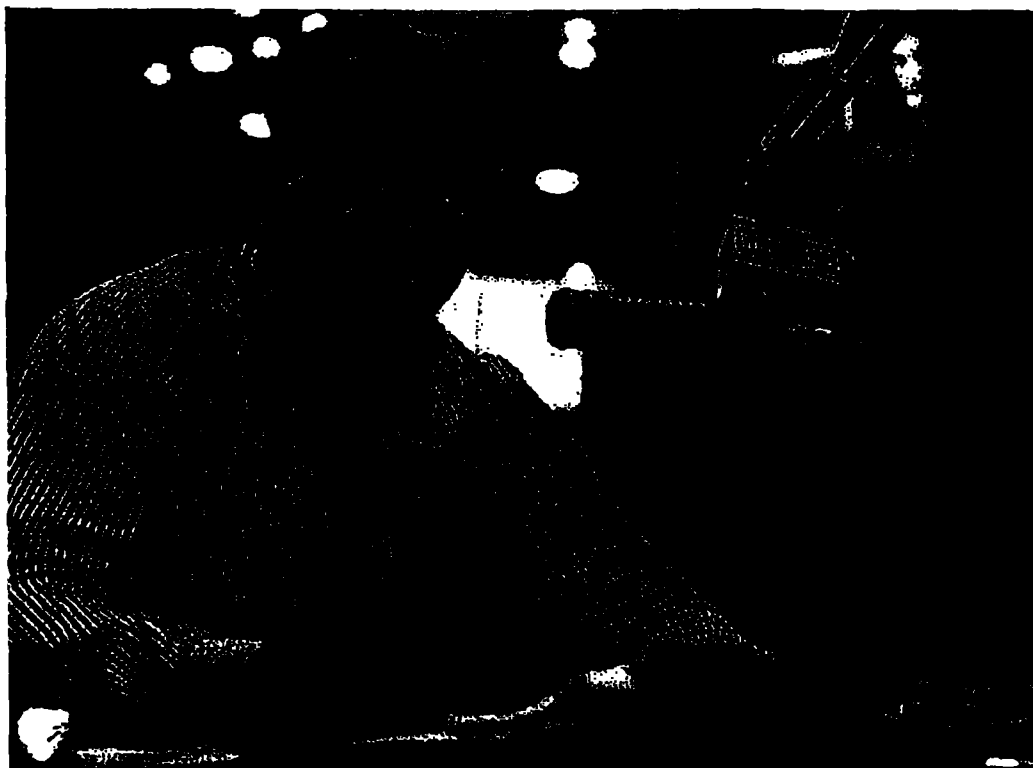
*Lisa Wilson-Foley, Connecticut 5th District Congress candidate.*

By Jordan Fenster, Staff Reporter

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How does the man who put John Rowland behind bars feel about the former Connecticut governor working for one of his opponents in the Republican 5th District congressional campaign?

"You have to question to what ends somebody would go to get elected," Mike Clark said Wednesday.



— Former Connecticut Gov. John Rowland fills in as a talk show host on WTIC AM radio in Farmington, Conn. (AP Photo/Jessica Hill)

Chris Healy, senior advisor to the Lisa Wilson-Foley campaign, confirmed that Rowland was involved in a recent Waterbury event for the Republican congressional candidate, as blogger Kevin Rennie first reported, though he said Rowland was not paid by the campaign.

"He is volunteering his time for the campaign like many people do," Healy said.

Clark, a former FBI agent, led the team that brought Rowland down on corruption charges in 2004.

Rowland ultimately resigned from office and spent a year in jail after pleading guilty to conspiracy to commit honest services fraud, mail fraud and tax fraud.

On one hand, Clark is understanding of both Rowland's experience (he served three terms as governor and was elected to the state House of Representatives at 23 years old) but the convicted felon's involvement would make him uncomfortable.

"He pled guilty, he served his time. He's certainly deserved a second chance," Clark said.

"But I certainly would not want him involved in my campaign, raising money and doing that kind of work for me."

Though he said he was "not implying that there's any problems with her fundraising efforts at all," Clark said Rowland's involvement "absolutely" raises questions about the Wilson-Foley campaign.

Healy said Rowland does not have "day-to-day" involvement in the Wilson-Foley campaign, and that the Waterbury event last week was not focused on fundraising.

"The event in question was a very low-dollar fundraiser," Healy said. "It was intended for Lisa to get to meet many of the people in Waterbury. It was more or less a social event. Heavy emphasis was not placed on fundraising."

According to Healy, "Rowland was "not part of any solicitation, other than to get people there."

Healy, like Clark, said the former governor has paid his dues.

"Anyone who has made serious mistakes in their lives, is entitled to get on with their lives," he said. "We all have our crosses to bear."

Email Jordan Fenster at [jfenster@nhregister.com](mailto:jfenster@nhregister.com). Follow him on Twitter [@jordanfenster](https://twitter.com/jordanfenster).

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Wednesday, April 25, 2012

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## John Rowland was paid by Lisa Wilson-Foley's husband in 'private business relationship'

Posted on April 23, 2012



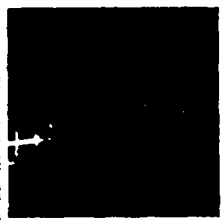
Former Connecticut governor John Rowland. (AP Photo/Jessica Hill)

By Jordan Fenster, Staff Reporter

Former Gov. John Rowland did have a "private business relationship" with Apple Rehab, a company owned by Brian Foley, husband to Republican 5th District congressional candidate Lisa Wilson-Foley, though campaign senior advisor Chris Healy said he could not elaborate further.

When asked if that business relationship, during which Rowland worked with Apple Rehab in "consulting capacity," ended prior to the start of Wilson-Foley's congressional campaign, Healy replied "I cannot say that for certainty. I don't know what the timeline was," though he did say the relationship is not currently active.

"John Rowland has never had or been compensated by the Wilson-Foley 2012 Congressional campaign or private businesses owned by Lisa Wilson Foley," Healy said in an email. "John Rowland has had a professional relationship with Apple Rehabilitation, a company owned by Brian Foley. There is no active professional relationship between Apple



— Lisa Wilson-Foley, Connecticut 5th District Congress candidate.

and John Rowland. John Rowland and the Foleys have a 20-year friendship and his support and counsel are always welcome."

Healy said he was not familiar with the nature of the relationship between Apple Rehab and Rowland because of the private nature of Foley's business, and "we keep things separate."

Rowland's involvement in Wilson-Foley's campaign has been well reported, and Healy clarified the extent of that involvement.

Healy confirmed that Rowland has been making calls to party delegates on Wilson-Foley's behalf, in addition to arranging at least one campaign event, but the former governor does not work for the campaign in the campaign office and is not remunerated for his work.

"He does it on his own time and on his own dime," Healy said. "It's not like he has a desk." Employees of Apple Rehab, including owner and operator Brian Foley, have given the Wilson-Foley campaign more than \$20,000 since the start of the campaign.

Previously on this topic:

- [Reactions: Rowland's radio show a conflict with 5th District campaigning](#)
- [WTIC: Rowland avoiding 5th District race on radio because he's working for Wilson-Foley](#)
- [John Rowland back in politics, pressuring GOP to back Lisa Wilson-Foley](#)
- [Republican leaders welcome John Rowland's role in 5th District race](#)
- [Blog backing Lisa Wilson-Foley heaps praise on John Rowland](#)
- [Lisa Wilson-Foley criticized for John Rowland backing by Mike Clark, who put him behind bars](#)
- [Lisa Wilson-Foley seeks fundraising help from John Rowland](#)

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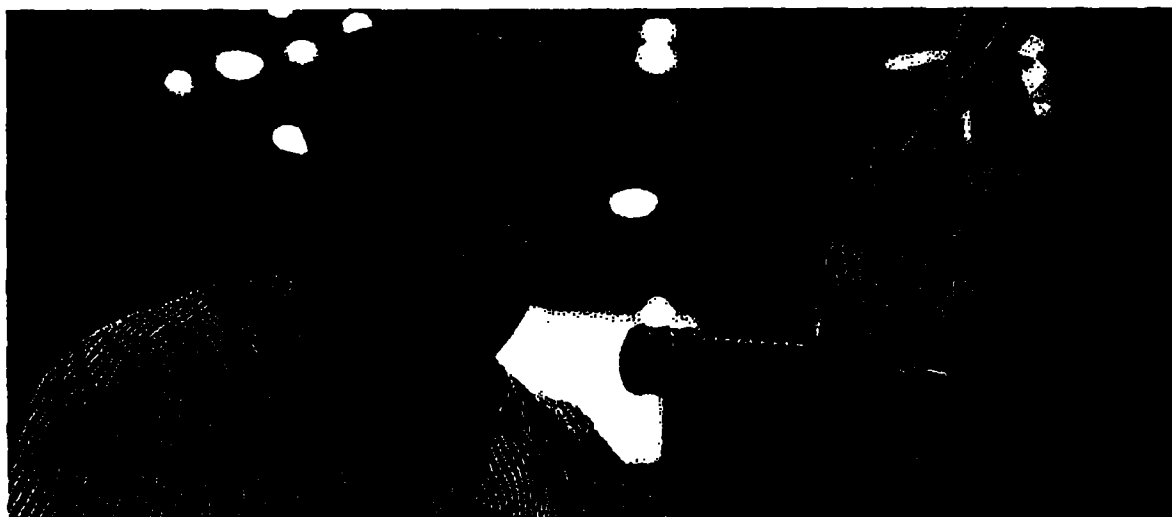
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Wednesday, April 25, 2012

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# John Rowland offered Mark Greenberg campaign help in exchange for animal shelter pay

Posted on April 24, 2012



Former Connecticut governor John Rowland. (AP Photo/Jessica Hill)

By Jordan Fenster, Staff Reporter

Former Gov. John Rowland offered "campaign consulting services" to Republican congressional candidate Mark Greenberg prior to Greenberg's 2010 run for congress,

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proposing that he be paid through the candidate's nonprofit animal shelter, according to a campaign spokesman.

Chris Cooper, director of communications for the Greenberg campaign, confirmed in an email that Rowland and Greenberg discussed the possibility in the candidate's 2010 campaign "prior to Mark deciding to run for any office."

**UPDATE: Mike Clark is filing an FEC complaint against the Lisa Wilson-Foley campaign.**



— Mark Greenberg, 5th District Congress candidate.

"The initial contact came when Mark first expressed interest in politics — months before he decided to run for any office," Cooper wrote on behalf of the campaign, responding to an emailed inquiry. "Never having been involved in politics before — a mutual friend put Mark and John together for Mark to get a better understanding of what running for public office was all about."

According to Cooper's response in the email, Rowland proposed being paid through the Simon Foundation, the nonprofit animal shelter Greenberg operates with his wife, Linda.

Greenberg "turned down the proposal," Cooper said in the email.

Rowland did not return messages left seeking comment.

Greenberg's campaign was not contacted by Rowland during the current election cycle, and other current Republican 5th District congressional candidates, Andrew Roraback and Justin Bernier, said they had not been contacted by Rowland, either. Republican candidate Mike Clark did not respond to requests for comment. Clark ran the FBI squad that investigated Rowland before the governor pleaded guilty to and was convicted on charges of conspiracy to commit honest services fraud, mail fraud and tax fraud. He served 10 months in prison, followed by a four-month house arrest.

Rowland is currently a volunteer for Republican Lisa Wilson-Foley's campaign, according to campaign senior advisor Chris Healy, who confirmed that the former governor has been making phone calls, some to delegates, on the

**"He does it on his own time and on his own dime," Healy said. "It's not like he has a desk."**

Healy also confirmed that Rowland did have a "private business relationship" with Apple Rehab, a company owned by Lisa Wilson-Foley's husband Brian Foley, working in a "consulting capacity."

Healy could not provide a timeline for that “private business relationship,” and said he did not know if it overlapped with Wilson-Foley’s 2012 congressional run, but said, “There is no active professional relationship between Apple and John Rowland.”

### Previous Coverage:

- John Rowland paid by Lisa Wilson-Foley's husband in "personal business relationship"
- Reactions: Rowland's radio show a conflict with 5th District campaigning
- WTIC: Rowland avoiding 5th District race on radio because he's working for Wilson-Foley
- John Rowland back in politics, pressuring GOP to back Lisa Wilson-Foley
- Republican leaders welcome John Rowland's role in 5th District race
- Blog backing Lisa Wilson-Foley heaps praise on John Rowland
- Lisa Wilson-Foley criticized for John Rowland backing by Mike Clark, who put him behind bars
- Lisa Wilson-Foley seeks fundraising help from John Rowland

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